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Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

SELINA KEENE, MELODY FOUNTILA,  
MARK MCCLURE,

Plaintiffs,

v.

CITY AND COUNTY OF SAN FRANCISCO

Defendant.

Lead Case No. 4:22-cv-01587-JSW

Case No. 4:22-cv-07455-JSW (*Debrunner* Action)

**STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO FILE ANSWER TO  
COMPLAINT FILED BY PLAINTIFFS  
DENISE ANGELINA DEBRUNNER ET AL.**

Date Action Filed: November 23, 2022

Trial Date: Not Set

Pursuant to Northern District of California Civil Local Rules 7-12, and 16-3(e), PLAINTIFFS DENISE ANGELA DEBRUNNER et al. (“Plaintiffs”) and DEFENDANT CITY AND COUNTY OF SAN FRANCISCO (“Defendant”) through their counsel of record, HEREBY AGREE AND STIPULATE AS FOLLOWS:

1. WHEREAS, on November 23, 2022, Plaintiffs filed this action against Defendant. Dkt. No. 1. Plaintiffs are 135 individuals and former or current employees of Defendant. Plaintiffs’ Complaint is 207 pages in length, of which 92 pages consist of Plaintiffs’ individual factual allegations against Defendant;

2. WHEREAS, on February 2, 2023, the case was reassigned to the Honorable Jeffrey S. White. See Dkt. No. 20;

3. WHEREAS, on March 14 and March 15, 2023, attorneys at Seyfarth Shaw, LLP filed notices of appearance with the Court to serve as lead counsel for Defendant. See Dkt. Nos. 31-33;

4. WHEREAS, on September 5, 2023, Seyfarth Shaw, LLP withdrew as lead counsel for Defendant pursuant to the Court’s Order.(Dkt. No. 77; Case No. 4:22-cv-04319-JSW). Defendant anticipates substitute counsel will appear in the Consolidated Actions soon;

5. WHEREAS, pursuant to the Parties’ Stipulation and the Court’s July 6, 2023 Order, the deadline for City to file an Answer to the Complaint is September 6, 2023. (Dkt. No. 63; 4:22-cv-07455-JSW);

6. WHEREAS, the Parties have agreed and respectfully submit that an extension of time for Defendant to file an Answer is necessary for the transition of Defendant’s defense.

THEREFORE, IT IS HEREBY STIPULATED AS FOLLOWS:

1. The Parties have agreed and respectfully submit that the withdrawal of former counsel for Defendant and its anticipated substitution of new counsel necessitate an extension for Defendant to file an Answer to Plaintiffs’ Complaint.

2. Defendant shall file its Answer by September 27, 2023.

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2 **IT IS SO STIPULATED.**  
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5 DATED: September 6, 2023

LIMANDRI & JONNA LLP

7 By: Robert E. Weisenburger

8 ROBERT E. WEISENBURGER

9 *Attorney for Plaintiffs*

*Denise Debrunner et al.*  
10

11 DATED: September 6, 2023

DAVID CHIU

City Attorney

12 LAUREN E. WOOD

ADAM SHAPIRO

13 Deputy City Attorneys  
14

15 By: Lauren E. Wood

16 LAUREN E. WOOD

17 Attorneys for Defendant

CITY AND COUNTY OF SAN FRANCISCO  
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**ATTESTATION OF E-FILED SIGNATURE**

I, Lauren E. Wood, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Extending Time to Respond to Complaint Filed By Plaintiffs Denise Angelina Debrunner et al. In compliance with Local Rule 5-1(i)(3), I attest that Robert E. Weisenburger has read and approved this pleading and consented to its filing in this action.

DATED: September 6, 2023

DAVID CHIU  
City Attorney  
LAUREN E. WOOD  
ADAM SHAPIRO  
Deputy City Attorneys

By: Lauren E. Wood  
Lauren E. Wood

**ORDER GRANTING EXTENSION OF TIME TO FILE ANSWER**

The Court finds the withdrawal of former counsel for Defendant and its anticipated substitution of new counsel necessitate an extension for Defendant to file an Answer to Plaintiffs' Complaint. Defendant shall file its Answer by September 27, 2023.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated:

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Hon. Jeffrey S. White  
UNITED STATES DISTRICT JUDGE